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# Petitions

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# Monitoring Petition

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- ◆ Under §75.66, an Authorized Account Representative (AAR) may petition the Administrator to request approval of an alternative to a monitoring requirement.



# Monitoring Petition

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- ◆ §75.66 describes the minimum information needed to consider a monitoring petition



# Monitoring Petition Process

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- ◆ 126 Sources
  - Submit to CAMD
  - cc: State and Region
  - CAMD will review and approve/disapprove as necessary



# Monitoring Petition Process

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- ◆ SIP Sources (Acid Rain)
  - Submit to CAMD
  - cc: State and Region
  - CAMD and State review
  - CAMD will approve or disapprove in consultation with the State
  - CAMD issues letter
- ◆ SIP Sources (non-Acid Rain)
  - Submit to State
  - cc: Region and CAMD
  - State and CAMD will review
  - Petitions are to be approved by both CAMD and State Permitting Authority
  - CAMD issues letter



# Monitoring Petition Process

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- ◆ The AAR submits a petition to the appropriate agencies.
- ◆ All petitions received by CAMD are logged into our tracking systems.
- ◆ Petitions are assigned to EMB contact on a regional contact basis.



# Monitoring Petition Process

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- ◆ EMB contact discusses petition with the source and the appropriate regional and/or state monitoring contact.
- ◆ EMB contact brings the petition with a recommendation to the policy team.
- ◆ Policy team discusses the petition and prepare a draft response.



# Monitoring Petition Process

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- ◆ Responses undergoes many iterations of reviews and approvals before it is finalized.
  - Management reviews and approves the draft response.
  - CAMD lawyer reviews and approves the draft response.
- ◆ Final letter is prepared for the appropriate signatures.





## Monitoring Petition Process

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- ◆ Source receives approval/disapproval of petition and may respond to our decision.
- ◆ CAMD goal is to finalize our decision on a petition within sixty days.

